

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Dondre Adams (K-59717),

Plaintiff,

v.

Rob Jeffreys, et al.,

Defendants.

Case No. 19 C 5452

Hon. Franklin U. Valderrama

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANTS' MOTION TO DISMISS**

Plaintiff Dondre Adams, by his attorneys Jenner & Block LLP, hereby moves this Court for an order extending the deadline for him to respond to Defendants' motion to dismiss by twenty-eight (28) days, to February 19, 2021, and similarly extending the deadline for Defendants to file their reply to March 3, 2021. In support of this Motion, Adams states as follows:

1. On November 6, 2020, Defendants filed a motion to dismiss Adams's Second Amended Complaint. (Dkts. 54–55.)
2. On December 17, 2020, this Court entered an order extending the time to respond to Defendants' motion to and including January 22, 2021, with Defendants' reply by February 3, 2021. (Dkt. 60.)
3. Adams's counsel requires additional time to prepare a response to Defendants' motion due to ongoing family medical issues arising from COVID-19. On December 10, both of undersigned counsel's parents were diagnosed with COVID-19, and one parent remains hospitalized with severe complications. Undersigned counsel has primary responsibility for their medical decisions and has devoted substantial time to their care. In addition, in early December, undersigned counsel

also was diagnosed with COVID and then a post-COVID condition that affected his ability to work until the end of December.

4. Counsel for Adams has contacted counsel for Defendants, who has advised that they do not oppose this request.
5. Accordingly, Adams respectfully requests that this Court enter an Order extending the deadline for filing his response brief by twenty-eight (28) days, to February 19, 2021. Adams also requests that this Court extend the deadline for Defendants' reply to March 3, 2021.

Dated: January 15, 2021

Respectfully submitted,

Dondre Adams

By: /s/ Gregory M. Boyle
One of his attorneys

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CERTIFICATE OF SERVICE

The undersigned, one of the attorneys for Plaintiff, hereby certifies that on January 15, 2021, he caused a true and correct copy of the foregoing **Unopposed Motion for Extension of Time to Respond to Defendants' Motion to Dismiss** to be electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a Notice of Electronic Filing to counsel of record as follows:

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By: /s/ Gregory M. Boyle

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